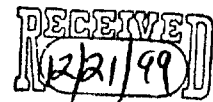




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December 10, 1999

Dr. Elizabeth Yetley
Office of Special Nutritionals
Food and Drug Administration
200 C Street SW
Washington D.C. 20204

Dear Dr. Yetley:

We are offering for sale the following product Pure Gels Ginkgo Biloba Extract, with the following Structure/Function claim: Promotes Healthy Circulation and Assists with Memory Function. The supporting side panel story is: Numerous clinical trials have shown Ginkgo Biloba supports healthy blood circulation to the brain and extremities. As an added benefit, healthy blood circulation may promote strong, memory function.

The FDA disclaimer will also appear on the label.

Sincerely,

Katie Ferren
Marketing Director

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